BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In the matter of:)	
Petition for Approval of Nextel South)	
Corp.'s Adoption of the Interconnection)	
Agreement Between Sprint	j	
Communications Company L.P., Sprint	j	Docket No. 2007-255-C
Spectrum L.P. d/b/a Sprint PCS And	ń	
BellSouth Telecommunications, Inc. d/b/a	j	
AT&T South Carolina d/b/a AT&T)	
Southeast		
In the matter of:)	
Petition for Approval of NPCR, Inc. d/b/a)	
Nextel Partners' Adoption of the)	
Interconnection Agreement Between	Ś	
Sprint Communications Company L.P.,	Ś	Docket No. 2007-256-C
Sprint Spectrum L.P. d/b/a Sprint PCS	j –	
And BellSouth Telecommunications, Inc.)	
d/b/a AT&T South Carolina d/b/a AT&T)	
Southeast	•	

MOTION TO CONSOLIDATE

COMES NOW NPCR, Inc., d/b/a Nextel Partners and Nextel South Corp. ("Nextel") and moves that the Commission fully consolidate the above-referenced proceedings. In support of its Motion, Nextel respectfully shows as follows:

1.

On August 31, 2007, the Commission issued a Notice of Hearing and a Prefile Testimony Letter in each of the above-styled proceedings. By these notices, the Commission has established separate filing deadlines and hearing dates in connection with each Nextel adoption Petition.

2.

The two Nextel adoption dockets before the Commission should be consolidated since the

substantive issues raised in the dockets are identical. Accordingly, for purposes of administrative

efficiency and economy, Nextel respectfully requests that the Commission fully consolidate the two

Nextel adoption Petition proceedings for consideration of BellSouth Telecommunications, Inc., d/b/a

AT&T South Carolina's ("AT&T") Motions to dismiss, setting a unified procedural schedule and

reaching a final determination with regard to these matters. Nextel further suggests that the

Commission select the procedural deadlines and hearing date already set for the Nextel South Corp.

Petition in Docket No. 2007-255-C as the procedural schedule and hearing date for the consolidated

proceedings. Nextel is authorized to state that counsel for AT&T and the Office of Regulatory Staff

concur with this requested consolidation.

CONCLUSION

WHEREFORE, in recognition of the foregoing, Nextel respectfully requests that the

Commission fully consolidate Docket Nos. 2007-255-C and 2007-256-C.

Respectfully submitted this 11th day of September, 2007.

/s/ J. Jeffrey Pascoe

J. Jeffrey Pascoe (SC Bar No. 71104)

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Attorneys for Nextel

BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA In the matter of: **Petition for Approval of Nextel South** Corp.'s Adoption of the Interconnection Agreement Between Sprint Docket No. 2007-255-C Communications Company L.P., Sprint Spectrum L.P. d/b/a Sprint PCS And BellSouth Telecommunications. Inc. d/b/a AT&T South Carolina d/b/a AT&T Southeast In the matter of: Petition for Approval of NPCR, Inc. d/b/a Nextel Partners' Adoption of the **Interconnection Agreement Between** Docket No. 2007-256-C Sprint Communications Company L.P., Sprint Spectrum L.P. d/b/a Sprint PCS And BellSouth Telecommunications,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September \coprod , 2007, she served a copy of the attached **Motion to Consolidate** by first-class mail, proper postage affixed addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es):

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